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2016 MAR -7 PM 4: 12

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March 7, 2016

LA PUBLIC SERVICE
COMMISSION

12922-0448

VIA HAND DELIVERY

Ms. Eve Kahao Gonzalez
Executive Secretary
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Baton Rouge, LA 70802

Ms. Terri Lemoine Bordelon
Records Division
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Baton Rouge, LA 70802

Re: LPSC Docket No. U-33434, Joint Application of Cleco Power LLC and Cleco Partners L.P. for: (i) Authorization for the Change of Ownership and Control of Cleco Power LLC and (ii) Expedited Treatment

Dear Ms. Gonzalez and Ms. Bordelon,

Enclosed for filing in the captioned docket are one (1) original and three (3) copies of Cleco Power LLC's and Cleco Partners L.P.'s Joint Motion for Immediate Rehearing and Reconsideration.

Please return one (1) date-stamped copy of the foregoing item to us at the time of filing.

If you have any questions, or require additional information, please do not hesitate to contact us.

Respectfully submitted,

Alan C. Wolf /mc

Alan C. Wolf
Counsel for Cleco Power LLC

Enclosure

cc: James L. Ellis
Thomas D. Gildersleeve
Robin P. Toups
Kari A. Bergerson
Docket No. U-33434 Service List

By Hand

COUNSELORS AT LAW

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

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L.A PUBLIC SERVICE
COMMISSION

JOINT APPLICATION OF CLECO)
POWER LLC AND CLECO)
PARTNERS L.P. FOR: (I))
AUTHORIZATION FOR THE)
CHANGE OF OWNERSHIP AND)
CONTROL OF CLECO POWER LLC)
AND (II) EXPEDITED TREATMENT)

DOCKET NO. U-33434

JOINT MOTION OF
CLECO POWER LLC AND CLECO PARTNERS L.P. FOR
IMMEDIATE REHEARING AND RECONSIDERATION OF THE
COMMISSION'S VOTE REJECTING THE CHANGE OF OWNERSHIP
AND CONTROL OF CLECO POWER LLC AS NOT IN THE PUBLIC
INTEREST

Cleco Power LLC ("Cleco Power") and Cleco Partners L.P. ("Cleco Partners") (collectively, "Applicants") submit this Motion for Immediate Rehearing and Reconsideration of the Louisiana Public Service Commission's ("LPSC" or "Commission") Vote Rejecting the Change of Ownership and Control of Cleco Power as Not in the Public Interest. Applicants' Motion is made pursuant to Rules 15 and 43 of the Commission's Rules of Practice and Procedure. Applicants further move that this motion be placed on the Supplemental Agenda for the Commission's March 16, 2016 Business and Executive Session ("B&E"), pursuant to Rule 15 of the Commission's Rules of Practice and Procedure; that the requested rehearing and reconsideration take place at the March 16, 2016 B&E; that the Applicants be permitted to make oral argument in support of this motion and in support of the requested authorization for the change of ownership and control of Cleco Power to Cleco Partners (the "Transaction"); and that the Application in this proceeding be granted. If this motion is not taken up at the March 16, 2016 B&E, Applicants will suffer immediate and irreparable harm.

I. BACKGROUND

At its February 24, 2016 B&E, the Commission heard testimony and took evidence

related to the Transaction, after which the Commission voted to reject the Transaction, as not in the public interest. Applicants submit that the Commission's vote was procedurally flawed and wrongly decided on the merits of the Transaction. Therefore, the Commission's determination that the Transaction is not in the public interest should be reheard and reversed.

At the February 24 B&E, the Applicants had only a brief opportunity at the beginning of the hearing to address the Commission on the merits of the Transaction. Opponents of the Transaction were then allowed approximately 6 hours to testify against the Transaction. Due to scheduling issues at the end of the hearing, the Applicants' request for an opportunity to offer brief reply and rebuttal testimony, which was supported by Commissioner Angelle, was denied by the Commission. Thus, the Applicants were denied the opportunity, as the party bearing the burden of proof in the proceeding, to adequately reply to and rebut certain incorrect and misleading statements made by opponents of the Transaction. The Commission then made a substantive determination regarding the Transaction based on a record that, thus, was materially incomplete and erroneous.

Applicants submit that the Commission's determination that the Transaction would not be in the public interest was wrongly decided and should be reheard and reversed. Applicants submit that Transaction, especially considering the revised indicative credit ratings and significant rate benefits to customers, would be in the public interest and should be authorized.

II. REQUESTED RELIEF

Rule 43 provides that an aggrieved party may file for rehearing within 10 days of the order, rule, or other action complained of. This motion for rehearing of the Commission's vote in this proceeding is, therefore, timely. Rule 15 provides that any motion related to a pending proceeding shall set forth the relief sought and the reasons and grounds therefore. Rule 15 further requires that any such motion be brought before the Commission at the earliest

practicable time.

Pursuant to Rules 15 and 43, and due to the significant procedural and substantive issues identified above, the Applicants request that this motion for rehearing and reconsideration be placed on the Supplemental Agenda for the Commission's March 16, 2016 B&E, pursuant to Rule 15 of the Commission's Rules of Practice and Procedure; that the requested rehearing and reconsideration take place at the March 16, 2016 B&E; that the Applicants be permitted to make oral argument in support of this motion and the Transaction, itself; and that the Application be granted.

Respectfully submitted,

PHELPS DUNBAR LLP

/s/ Alan C. Wolf

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Attorneys for Cleco Partners L.P.

CERTIFICATE OF SERVICE

I hereby certify that I have on this 7th day of March, 2016, served copies of the foregoing upon all known parties to this proceeding by electronic mail and/or by U.S. Mail, postage prepaid and properly addressed to all parties of record.


Francisca Comeaux

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have, this 7th day of March, 2016, served copies of the foregoing pleading upon all known parties of this proceeding by electronic mail.

Nathan G. Huntwork

Nathan G. Huntwork
Louisiana Bar No. 31789